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June 1, 2022

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**Via ECF**

Hon. Andrew L. Carter Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Kleinman v. Roc Capital Holdings LLC, et al.*  
Case No.: 1:22-cv-02566-ALC

Dear Judge Carter:

This firm represents Chaim Porges and Helena Porges (hereinafter collectively the “Porges Defendants”), two Defendants in the above-referenced case. I write to request, on consent, an adjustment to the briefing schedule for Plaintiff’s Order to Show Cause, which adjustment would permit some additional time for both the Porges Defendants and Plaintiff to make their submissions but not affect the schedule hearing date.

By way of background, shortly after the commencement of this action, on May 11, this Court issued an Order to Show Cause which, *inter alia*, ordered the Defendants to respond to Plaintiff request for the appointment of a temporary receiver over certain real property belonging and for expedited discovery. In proposing the Order to Show Cause, Plaintiff filed a lengthy set of documents featuring a client declaration that was twenty pages long and referenced several sets of transactions and cases, a lengthy memorandum of law, and over twenty-five exhibits. In the Order to Show Cause, the Court set the following schedule: Opposition by June 1, Reply by July 7, with a Hearing on June 16.

As an initial matter, it is respectfully submitted that the date provided for reply (July 7) appears to be a typographical error and that it was intended to be June 7, which would give Plaintiff six days following the filing of the opposition in order to submit a reply. In addition, due to the lengthy motion, along with the forthcoming Jewish holiday which would eat into Plaintiff’s reply time, the Porges Defendants have proposed, and the parties have agreed to, an extension of two days to submit their respective papers. Accordingly, the Porges Defendants respectfully request that their Opposition be due June 3, 2022 and Plaintiff’s Reply be due June 9, 2022. Notably, this request for an adjustment of the Order to Show Cause submission deadlines will not affect any other deadlines in the case, including the Hearing date.

The Porges Defendants and undersigned counsel thank the Court for its kind consideration. Please do not hesitate to contact me should Your Honor have any questions or concerns.

Respectfully submitted,

/s/Jeremy M. Doberman  
Jeremy M. Doberman

cc: All counsel of record (via ECF)

